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May 1, 2019

**Via ECF**

The Honorable Ona T. Wang, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Vicente, et al. v. Ljubica Contractors LLC, et al.*  
Case No. 18-cv-419(VSB)(OTW)

Dear Judge Wang:

We are counsel to Plaintiffs and write to respectfully request that the Court (1) strike Defendants' Answer and (2) impose sanctions against Defendants' counsel, John P. DeMaio.

On December 28, 2018, Plaintiff submitted a letter motion to Your Honor for the above relief following Defendants' flagrant disregard for the Court's Orders in the above-referenced matter and failure to appear for conferences. See **Exhibit A** or Dkt. # 39.

Furthermore, Your Honor Ordered Defendants and their counsel to show cause by December 28, 2018, as to "why sanctions should not be imposed on Defendant and/or Mr. DeMaio." Dkt. # 37.

To date, Defendants have not shown cause as to why they should not be sanctioned by the Court and have not opposed Plaintiffs' letter motion to Your Honor to strike Defendants' Answer and to impose sanctions upon Defendants' counsel.

Therefore, Plaintiffs respectfully request that the Court grant Plaintiffs' letter motion, dated December 28, 2018, to strike Defendants' Answer so that Plaintiffs can request for a default judgment and to impose sanctions upon Defendants' counsel for his egregious conduct.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee, Esq.

cc: John P. DeMaio, Esq. (via ECF)